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September 27, 1996

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

**In the Matter of:**

## Telephone Number Portability

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Enclosed are an original and sixteen copies plus two extra public copies of Cincinnati Bell Telephone Company's Comments on Petitions for Reconsideration filed on August 26, 1996 in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to Ms. Patricia Rupich at the above address or by calling (513) 397-6671.

Sincerely,

David J. Meier

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cc: Wanda M. Harris, Competitive Pricing Division (diskette)

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

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*FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY*

**In the Matter of** )  
Telephone Number Portability ) CC Docket No. 95-116  
 ) RM 8535  
 )

**COMMENTS ON PETITIONS FOR RECONSIDERATION  
OF PACIFIC TELESIS GROUP AND  
BELLSOUTH CORPORATION**

**I. INTRODUCTION**

Cincinnati Bell Telephone Company ("CBT") submits these comments on the petitions for reconsideration of the Commission's July 2, 1996 First Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 95-116 filed by Pacific Telesis Group and its subsidiaries ("Pacific Telesis") and BellSouth Corporation ("BellSouth").

**II. DISCUSSION**

**A. THE COMMISSION SHOULD GRANT PACIFIC TELESIS' REQUEST TO ALLOW QOR TO BE USED WITHIN A CARRIER'S NETWORK OR BETWEEN CONSENTING CARRIERS' NETWORKS.**

CBT fully supports Pacific Telesis' petition requesting that the Commission clarify or reconsider its decision in this proceeding relative to the use of QOR. As Pacific Telesis adequately demonstrates, when QOR is used on intra network calls (i.e., calls originated by a carrier's customers to NXXs originally assigned to that carrier's network), the Commission's performance criteria are satisfied. No carrier will be forced to rely on another carrier's network or require any capabilities which would not otherwise be required with LRN. Regardless of

the querying methodology, LECs will always be dependent on the originating carrier to determine the most efficient routing from the originating network to the terminating network. QOR simply provides a tool to optimize that routing without reliance on another network.

CBT also urges the Commission to carefully review the evidence provided by Pacific Telesis regarding the benefits of QOR. Customers depend upon the reliability of the telecommunications network and CBT believes they are not willing to risk this reliability for the sake of implementing number portability on the aggressive schedule established by the Commission. CBT submits that the implementation of LRN may risk this network reliability as supported by the Pacific Telesis petition for reconsideration. However, by simply allowing QOR for intra network calls and calls between consenting carriers' networks, the Commission can reduce the risks to network reliability and make it more feasible for carriers to implement number portability according to the Commission's schedule.

**B. IMPLEMENTATION INTERVALS SHOULD BE EXTENDED BY 90 DAYS**

In its Petition, BellSouth asks the Commission to extend the implementation period for Phase I and Phase II from 90 to 180 days. CBT fully supports BellSouth's request. CBT believes that the current implementation schedule does not consider all of the changes a carrier must make to its systems in order to implement number portability. As BellSouth indicates, providing number portability involves much more than loading LRN software into LEC switches. In order to implement number portability, CBT, like many other carriers, must upgrade the "generic" software in its switches before it can even begin the activation of the LRN software. Thus, although as BellSouth indicates, switch vendors have told the Commission that they can meet the Commission's schedule for producing the LRN software,

that does not account for other upgrades carriers will need to undertake prior to implementation. For many carriers the necessary system upgrades were not previously on the planning horizon, or if they were, the number portability implementation schedule will necessitate undertaking these upgrades sooner than otherwise planned.

In addition to the switch upgrades, LNP implementation requires major changes to operational support systems. Changes to these systems will be comparable regardless of the size and resources of any particular LEC.<sup>1</sup> Expecting that small and mid-size LECs will be able to make these changes as quickly as the RBOCs is unrealistic. The Commission seems to assume that just because a LEC is located in one of the top 100 MSAs, it has the same resources as the RBOCs. This is not the case.

As USTA indicated in its comments on the FNPRM in this proceeding, many small and mid-size LECs are located in the top 100 MSAs.<sup>2</sup> Carriers that are a fraction of the size of the large companies cannot afford to be on the cutting edge of technological development and implementation. Although many of these companies employ new technology in a timely manner, they often rely on larger companies to first test the implementation of new technology in order to reduce costs. With the aggressive LNP implementation schedule the Commission has established, small and mid-size carriers in the top 100 MSAs will not have the ability to wait until problems with new technology are resolved. Unless a small or mid-size carrier can successfully secure a suspension of these requirements from its state commission under the provisions of Section 251(f)(2), it must comply with the implementation schedule. Customers

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<sup>1</sup> See CBT Comments on the FNPRM in this proceeding at p. 4.

<sup>2</sup> Comments of USTA, Attachment A.

of these carriers could be subjected to risks if their carrier must implement a new technology without adequate testing. Allowing an extra 90 days for implementation of LNP will help accommodate the varying resources among LECs.

Thus, in recognition of the untested nature of the LNP technology during the early phases of LNP implementation and the differences in resources between larger and smaller LECs, CBT urges the Commission to favorably consider BellSouth's petition for an extension of the Phase I and II implementation periods by 90 days.

CBT also recommends that the Commission clarify that small and mid-size companies that are granted a suspension or modification of the number portability requirement pursuant to Section 251(f)(2) are automatically relieved of complying with the Commission's implementation schedule until the suspension is removed by the state commission. Carriers should not be required to also request a waiver of the implementation dates from the Chief of the Common Carrier Bureau as outlined in the Order.<sup>3</sup>

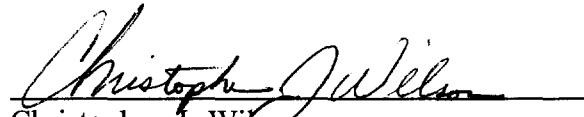
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<sup>3</sup> Order at ¶ 85.

### **III. CONCLUSION**

CBT respectfully requests the Commission to consider these comments as it addresses the petitions for reconsideration filed in this proceeding by Pacific Telesis and BellSouth.

Respectfully submitted,

  
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that copies of **Cincinnati Bell Telephone Company's Comments on Petitions for Reconsideration** have been delivered by first class United States Mail, postage prepaid, on September 27, 1996, to the persons on the attached service list.

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